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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

PROGRESSIVE CASUALTY INSURANCE  
COMPANY,

Plaintiff,

vs.

ZURICH-AMERICAN INSURANCE  
COMPANY, HARJIT SINGH dba HARRY  
BROS. TRUCKING, RELIABLE  
TRUCKING, INC., DENNIS MATEO and  
JoANN MATEO,

Defendants.

Case No.: C-06-01930-JCS

**SECOND STIPULATION EXTENDING  
DEFENDANTS' TIME TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**Civil Local Rules 6-1(a)**

Plaintiff, Progressive Casualty Insurance Company (hereinafter, "Progressive"), by and through its counsel of record, Richard W. Osman of Bertrand, Fox & Elliot, and defendant ZURICH-AMERICAN INSURANCE COMPANY ("Zurich"), by and through its counsel of record Mark Koop of Lewis Brisbois Bisgaard & Smith, LLP, and defendant RELIABLE TRUCKING, INC. ("Reliable") by and through its counsel of record Jonathan King, of ROBINSON & WOOD, INC. hereby agree and stipulate as follows:

1 Plaintiff filed its complaint on March 14, 2006. Defendant Zurich was served on April  
2 21, 2006. Defendant Reliable was served on April 20, 2006. The parties acting by and through  
3 their attorneys stipulated that defendant Zurich's time to respond to the complaint be extended to  
4 May 25, 2006 and that Reliable's time to respond to the complaint be extended to May 24, 2006.  
5 The Court ordered the stipulations.  
6

7 The present action arises out of a coverage dispute that arose in Alameda County  
8 Superior Court Case No. RG04183951, entitled *Mateo v. Singh*. That matter was recently settled  
9 and the coverage dispute between Progressive and Zurich has also recently been settled.  
10 Therefore, it is Progressive's intention to voluntarily dismiss the present action pursuant to FRCP  
11 Rule 41 after the settlement documents have been executed.  
12

13 In order to permit time for the settlement paperwork to be completed, the parties hereby  
14 stipulate that defendants will file and serve their responsive pleadings by June 15, 2006.  
15

16 SO STIPULATED.

17 Dated: May 24, 2006

BERTRAND, FOX & ELLIOTT

18 By: 

19 Richard W. Osman  
20 Attorney for Plaintiff PROGRESSIVE  
CASUALTY INSURANCE COMPANY

21 Dated: May 24, 2006

LEWIS BRISBOIS BISGAARD & SMITH, LLP

22 By: 

23 Mark Koop  
24 Attorney for Defendant ZURICH-  
AMERICAN INSURANCE COMPANY

25 Dated: May \_\_\_\_\_, 2006

ROBINSON & WOOD

26 By: \_\_\_\_\_

27 Jonathan King  
28 Attorney for RELIABLE TRUCKING

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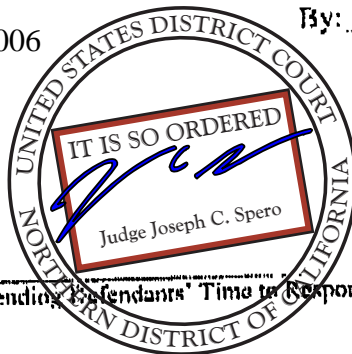
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24 Attorney for Defendant ZURICH-  
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26 By: \_\_\_\_\_

27 Jonathan King  
28 Attorney for RELIABLE TRUCKING



Second Stipulation Extending Defendants' Time to Respond to Plaintiff's Complaint